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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA,)
10 Plaintiff,) CASE NO. 2:18-CR-00322-APG-BNW
11 vs.)
12 THIEN DINH LE,)
13 Defendant.)
14

15 **STIPULATION TO CONTINUE SENTENCING HEARING**
16 **(Sixth Request)**

17 IT IS HEREBY STIPULATED AND AGREED, between the United States of America, by
18 and through its attorney, Christopher Chiou, Acting United States Attorney, through Kevin Douglas
19 Schiff, Assistant United States Attorney; and Defendant Thien Dinh Le, by and through his counsel,
20 Monti Jordana Levy, Esquire, Wright Marsh & Levy, that the sentencing hearing currently scheduled
21 for April 28, 2021, at 1:00 p.m. be vacated and set to a date and time convenient to this Court, but
22 no sooner than sixty (60) days from the current sentencing date.

23 This stipulation is entered into for the following reasons:

- 24 1. Defense Counsel needs additional time to review information and prepare for a
25 sentencing memorandum and presentation in support of a just and reasonable sentence.
26 2. The parties agree to the continuance. Mr. Le is currently in custody and agrees to the
27 continuance.

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1 3. Additionally, denial of this request for continuance could result in a miscarriage of
2 justice.

3 4. The additional time requested by this Stipulation is made in good faith and not for
4 purposes of delay.

5 5. This is the sixth request for a continuance of the sentencing hearing.

6 Dated this 24th day of March, 2021.

7 Respectfully submitted:

8 WRIGHT MARSH & LEVY

CHRISTOPHER CHIOU
ACTING UNITED STATES ATTORNEY

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10 BY /s/ Monti Jordana Levy
11 MONTI JORDANA LEVY, ESQUIRE
Attorney for Defendant Jordan

BY /s/ Kevin Douglas Schiff
KEVIN DOUGLAS SCHIFF
Assistant U.S. Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,)
4 Plaintiff,)
5 vs.)
6 THIEN DINH LE,)
7 Defendant.)
8


CASE NO. 2:18-CR-00322-APG-BNW

ORDER

9 Based on the Stipulation of the parties, the sentencing hearing in this matter is hereby
10 continued. The ends of justice served by granting said continuance outweigh the best interest of the
11 public and the defendant in a speedy sentencing, since the failure to grant said continuance would
12 be likely to result in a miscarriage of justice, and would deny the parties herein sufficient time and
13 the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking
14 into account the exercise of due diligence.

15 IS IT HEREBY ORDERED that the sentencing in the above-captioned matter currently
16 scheduled for April 28, 2021, at 1:00 a.m., be vacated and continued to June 30, 2021,
17 at 2:00 p.m.

18 DATED: March 29, 2021

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21 ANDREW P. GORDON
22 United States District Judge
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